

# PRIVACY POLICY

Protecting the confidentiality of our clients personal and confidential information has always been an important part of the way we do business. To ensure we protect their privacy, Baby Brands International Inc. / Baby Brands Gift Club has created this Privacy Policy. This Policy sets out how and why we collect and use personal information from our clients. It also explains the circumstances under which we will be required to disclose it.

**"Personal information" means information that identifies you as a specific individual, including but is not limited to:**

- Name;
- Spouse's or Partner's Name;
- Address;
- Telephone number (s);
- Email Address;
- Date of birth or expected date of birth and gender of your child (ren).

The federal Protection of Personal Information and Electronic Documents Act (PIPEDA) and similar provincial legislation in Quebec, British Columbia and Alberta set out the rules and principles for the use and disclosure of personal information based on the ten privacy principles developed by the Canadian Standards Association.

Under the legislation, an organization may collect, use or disclose personal information only for the limited purposes that a reasonable person would consider to be appropriate in the circumstances.

Our Privacy Policy sets out how we comply with these principles. It explains how we ensure that your privacy and the confidentiality of your personal information are protected.

## The Ten Privacy Principles

### **Principle #1: Our Accountability for the Collection, Use or Disclosure of Personal Information:**

We are responsible for maintaining and protecting your personal information while it is under our control. This includes any personal information we disclose to third parties (our "Partners, Sponsors and Advertisers"). To help ensure the confidentiality of your personal information, we have established policies and procedures to ensure that we comply with the Personal Information Protection and Electronic Documents Act and substantially similar provincial legislation. We have designated a privacy officer who is responsible for our company's compliance with the ten privacy principles.

If you have any questions or inquiries about how your personal information is stored, or when it may need to be disclosed to others, our privacy officer is there to assist and explain our policies to you.

### **Principle #2: Identifying Our Purpose for the Collection, Use or Disclosure of Personal Information:**

Non-financial, basic contact information is maintained by Baby Brands Gift Club systems for past and current clients who have registered with Baby Brands Gift Club ("Registrants"). Each Registrant's basic contact information such as name, spouse's or partner's name, address, email address, telephone number (s) and/or age and gender of child (ren) will only be supplied to Baby Brands Gift Club Partners, Sponsors or Advertisers, current or future. Such basic contact information is provided to the Partners, Sponsors and Advertisers under strict contractual agreement that the information is for their sole use in informing the client of offerings regarding their products and/or services. Baby Brands Gift Club may receive compensation from its Partners, Sponsors or Advertisers for sharing registrant information. A complete list of our Partners, Sponsors and Advertisers can be viewed by observing the banner on the main page/About Us page on our the Company website [www.bbgiftclub.ca](http://www.bbgiftclub.ca)

### **Principle #3: Obtaining your Consent for the Collection, Use or Disclosure of Personal Information:**

By completing a Baby Brands Gift Club registration card or by registering online on the Baby Brands Gift Club website, you consent to the use of your personal information for the purposes described in Principle 2, above.

Unless we are required by law, Baby Brands will not use or disclose any personal information that has been collected for any other purpose without documenting the new purpose and obtaining your consent. If you have any questions about these purposes, our privacy officer will be pleased to explain them to you.

The Personal Information Protection and Electronic Documents Act recognizes that when information is being collected for the detection and prevention of fraud or for law enforcement, seeking the consent of an individual may defeat the purpose of collecting the information. Seeking consent may also be impossible or inappropriate when the individual is a minor, seriously ill, or mentally incapacitated.

### **Principle #4: Limiting Our Collection of Personal Information:**

We will always limit the personal information that we collect to that which is necessary for the identified purposes.

### **Principle #5: Limiting the Use, Disclosure and Retention of Personal Information:**

Personal information will not be used or disclosed for purposes other than for which it was collected, except with your consent or as permitted or required by law. Your personal information will be retained only as long as it is necessary to fulfill those purposes. Contact information is maintained online in perpetuity; unless and until, you specifically request in writing (email from the registered email address being acceptable) or by verifiable telephone contact via the toll free or office telephone number to remove your records. Then your record is red flagged to any Sponsor and Advertiser having access as "Please Remove – No Further Contact!" and after one (1) complete six (6) month cycle, permanently removed from the Baby Brands Gift Club systems.

Registrants of the systems may also elect to "Opt-Out" of the Baby Brands Gift Club Sponsor and Advertiser contact for additional future while remaining with Baby Brands Gift Club in order to be eligible for future Club offerings and draws. This may be done by specifically requesting that in writing (email from the registered email address being acceptable) or by verifiable telephone contact via the toll free or office telephone number. Again, the client's record is red flagged to all Partners, Sponsors and Advertisers as "Please Remove – No Further Contact!" but the record remains within the system for the client's own access and use.

**Principle #6: Keeping your Personal Information Accurate:**

Baby Brands makes every effort to ensure that personal information about you is as accurate, complete, and up-to-date as is necessary for the purposes for which it was collected. If you have any questions about the accuracy and completeness of the personal information that we have collected or retained, please do not hesitate to contact our privacy officer. If you need to update some aspect of your personal information, please contact us. It is our intent to provide you password protected access so that you may in fact review and update your information no later than the end of the first quarter of 2015.

**Principle #7: Safeguarding your Personal Information:**

Baby Brands takes steps to protect personal information with security safeguards appropriate to the sensitivity of the information. Specifically, we have stringent security measures in place to protect personal information against such risks as loss or theft, computer hackers, unauthorized access, disclosure, copying, use, modification or destruction.

Baby Brands protects your personal information regardless of the format in which it is held. We also protect personal information we disclose to Partners, Sponsors and Advertisers by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

All our employees and any outside contractors with access to personal information are required as a condition of their employment or contract to keep any and all personal information confidential.

**Principle #8: Openness Concerning our Privacy Practices:**

Baby Brands pursues a policy of openness about the procedures it uses to manage personal information. We will make specific information about our policies and practices relating to the management of their personal information available to you upon request.

**We ensure openness by providing you with the following information:**

- a) the title and address of the privacy officer accountable for our compliance with the policy;
- b) the name of the individual to whom inquiries or complaints can be forwarded;
- c) the means of gaining access to personal information held by Baby Brands; and
- d) a description of the type of personal information held by Baby Brands, including a general account of its use.

Baby Brands makes information available to help you exercise informed choices regarding the use of your personal information.

**Principle #9: Policyholder Access to Personal Information:**

Baby Brands will inform you of the existence, use, and disclosure of their personal information upon request and provides access to that information. You are able to challenge or correct the accuracy and completeness of their personal information and have it amended when appropriate. When a request is made in writing, we will inform you in a timely fashion, of the existence, use, and disclosure of your personal information and you will be given access to that information. In order to safeguard your personal information, we may require you to provide sufficient identification information to permit us to authorize access to your file. You can obtain information or seek access to your individual files by contacting our designated privacy officer at the address described below.

**Principle #10: Challenging Compliance:**

You have the right to challenge Baby Brand's compliance with the above principles by contacting the privacy officer accountable for our compliance with the policy. Baby Brands maintains strict procedures for addressing and responding to all inquiries or complaints from its customers about its handling of personal information. We inform our customers about our privacy practices as well as availability of complaint procedures, if necessary.

Our privacy officer will investigate all complaints concerning compliance with the privacy policy. If a complaint is found to be justified, we will take appropriate measures to resolve the complaint including the amendment of our policies and procedures.

Adopted: July 2012

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Privacy Officer

[privacyofficer@babybrandsgiftclub.ca](mailto:privacyofficer@babybrandsgiftclub.ca) or call 1 855 803-9227